**Remarks**

The Office Action mailed May 7, 2003 has been carefully reviewed and the foregoing amendment has been made in consequence thereof.

Claims 1-4, 6-11, 13-16, and 18-23 are pending in this application. Claims 1-4, 6-16, and 18-23 stand rejected. Claims 5, 12, and 17 have been cancelled.

The rejection of Claims 1-4, 6-16, and 18-23 under 35 U.S.C. § 102(b) as being anticipated by Jackson et al., Strategic Database Marketing (1996) (referred to herein as "Jackson") is respectfully traversed.

Applicants respectfully submit that Jackson does not describe nor suggest the claimed invention. As discussed below, at least one of the differences between Jackson and the present invention is that Jackson neither describes nor suggests determining a sequential order for combining models to define a target group, and combining the models in the determined sequential order to define the target group. Rather, Applicants respectfully submit that Jackson teaches away from the present invention.

More specifically, Jackson describes at page 180, section 1 that "Based on multiple linear regression analysis, the retailer again found out that the most important predictor was spending one hundred dollars on books...A value of 10 points was assigned to that variable...The second most important predictor was the gender of the customer, with a value of 8 points attributed to females...Finally, interests in gourmet cooking and wine were assigned point values of 5 and 6, respectively." However, Jackson does not teach determining a sequential order for combining models. Rather, Jackson describes a process wherein the predictors are weighted but the sequential order of combining the predictors makes absolutely no difference. In contrast, the present invention describes determining a sequential order for combining models to define a target group, and combining the models in the determined sequential order to define the target group.

Jackson generally describes a business-based approach to strategic database marketing, wherein historical data collected by a marketer is stored in historical data management databases such that the historical data can be later used by the marketer. (See pages 27-28.) Jackson also describes a recency, frequency, and monetary (RFM) analysis that allows a marketer to identify a business' "best customers" based upon the frequency and sales dollars that the customers have spent with the business. The RFM data can also be used to create a lifetime value model of customers, which can project the value of a customer over a period of years. (See pages 40-41.) Jackson further describes combining models so that a marketer can determine the most desirable segments upon which to focus the allocation of marketing resources. (See pages 184-185.) The database-driven marketing programs enable a business to target a specific product to the correct consumer in order to make a sale. (See page 39.)

Claim 1 recites a method for increasing the efficiency of marketing campaigns using a targeting engine for analyzing data input and generating data output, wherein the method includes "using historical data to determine a target group based upon a plurality of models embedded within and executed by the targeting engine, the targeting engine is configured to determine a sequential order for combining the models to define the target group, and combine the models in the determined sequential order to define the target group and determine a risk factor for the target group...and directing the marketing campaign towards the target group determined by the models."

Jackson does not describe nor suggest a method for increasing the efficiency of marketing campaigns as recited in Claim 1. More specifically, Jackson does not describe nor suggest a targeting engine configured to determine a sequential order for combining models to define a target group, and combine the models in the determined sequential order to define the target group.

Rather, Jackson describes a business-based approach to strategic database marketing that uses historical data and models to generate data that is then analyzed by a marketer to determine the most desirable segments upon which to focus the allocation of marketing resources.

According to page 11 of the Office Action, Jackson describes a targeting engine that "solves each of the plural models (i.e. executing) in a specific order to determine a score for each customer (See page 180, section 1, page 181, sections 1 and 2, page 182, all, page 184, section 1, wherein two sequential orderings occur: the variables within these models are weighted and ordered in a specific sequence and the primary model is applied first and then the secondary model)." Applicants respectfully traverse this suggestion. In fact, as explained below, Applicants respectfully submit that Jackson teaches away from the present invention because Jackson teaches that the order in which the predictors are combined makes absolutely no difference to the final output.

Jackson describes at page 180, section 1 that "Based on multiple linear regression analysis, the retailer again found out that the most important predictor was spending one hundred dollars on books...A value of 10 points was assigned to that variable...The second most important predictor was the gender of the customer, with a value of 8 points attributed to females...Finally, interests in gourmet cooking and wine were assigned point values of 5 and 6, respectively." In other words, Jackson describes a process that assigns weighted points to each predictor, evaluates each potential customer by applying the predictors, and then totals the points for each potential customer based on the predictors to generate an output.

Applicants respectfully submit that although the predictors in Jackson are weighted, the order of combining the predictors does not matter. Rather, the predictors can be combined in any order because the output is merely a total of the points assigned to the predictors found in each potential customer, and is not based on the order in which the models are combined. Thus, in contrast to the present invention, the output in Jackson does not include each potential customer that satisfies the combined models, but rather the output in Jackson includes all of the potential

9

customers in a database with a total point number assigned wherein the total point number for each potential customer would not necessarily indicate which predictors applied to the particular potential customer. Thus, Applicants respectfully submit that Jackson does not describe nor teach determining a sequential order for combining models to define a target group, and combining the models in the determined sequential order to define the target group. Accordingly, Applicants respectfully submit that Claim 1 is patentable over Jackson.

For at least the reasons set forth above, Applicants respectfully request that the 35 U.S.C. § 102(b) rejection of Claim 1 be withdrawn.

Claims 2-4, 6-10, and 22 depend, directly or indirectly, from independent Claim 1. When the recitations of Claims 2-4, 6-10, and 22 are considered in combination with the recitations of Claim 1, Applicants submit that dependent Claims 2-4, 6-10, and 22 likewise are patentable over Jackson.

Claim 11 recites a system configured to increase efficiency of marketing campaigns that includes "a customer database which includes customer demographics and historical data…a targeting engine for analyzing data input and generating data output, said targeting engine having a plurality of models stored thereon, said targeting engine configured to access said historical data, determine a sequential order for combining said models to define the target group, and combine said models in the determined sequential order to determine a target group for marketing and determine a risk factor for the target group…and a graphical user interface for accessing customer database and displaying data output."

Jackson does not describe nor suggest a system configured to increase efficiency of marketing campaigns as recited in Claim 11. More specifically, Jackson does not describe nor suggest a targeting engine configured to determine a sequential order for combining models to define a target group, and combine the models in the determined sequential order to determine a target group for marketing.

10

Rather, Jackson describes a business-based approach to strategic database marketing that uses historical data and models to generate data that is then analyzed by a marketer to determine the most desirable segments upon which to focus the allocation of marketing resources.

According to page 11 of the Office Action, Jackson describes a targeting engine that "solves each of the plural models (i.e. executing) in a specific order to determine a score for each customer (See page 180, section 1, page 181, sections 1 and 2, page 182, all, page 184, section 1, wherein two sequential orderings occur: the variables within these models are weighted and ordered in a specific sequence and the primary model is applied first and then the secondary model)." Applicants respectfully traverse this suggestion. In fact, as explained below, Applicants respectfully submit that Jackson teaches away from the present invention because Jackson teaches that the order in which the predictors are combined makes absolutely no difference to the final output.

Applicants respectfully submit that although the predictors in Jackson are weighted, the order of combining the predictors does not matter. Rather, the predictors can be combined in any order because the output is merely a total of the points assigned to the predictors found in each potential customer, and is not based on the order in which the models are combined. Thus, in contrast to the present invention, the output in Jackson does not include each potential customer that satisfies the combined models, but rather the output in Jackson includes all of the potential customers in a database with a total point number assigned wherein the total point number for each potential customer would not necessarily indicate which predictors applied to the particular potential customer. Thus, Applicants respectfully submit that Jackson does not describe nor teach a targeting engine configured to determine a sequential order for combining models to define a target group, and combine the models in the determined sequential order to determine a target group for marketing. Accordingly, Applicants respectfully submit that Claim 11 is patentable over Jackson.

For at least the reasons set forth above, Applicants respectfully request that the 35 U.S.C. § 102(b) rejection of Claim 11 be withdrawn.

Claims 13-16, 18-21, and 23 depend, directly or indirectly, from independent Claim 11. When the recitations of Claims 13-16, 18-21, and 23 are considered in combination with the recitations of Claim 11, Applicants submit that dependent Claims 13-16, 18-21, 23 likewise are patentable over Jackson.
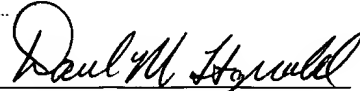
For at least the reasons set forth above, Applicants respectfully request that the 35 U.S.C. § 102(b) rejection of Claims 1-4, 6-16, and 18-23 be withdrawn.

In addition, newly added Claims 24 and 25 depend from independent Claim 1, which is believed to be in a condition for allowance. Moreover, Claims 24 and 25 include the recitation "combining the models in the determined sequential order to define the target group by applying a first model included in the determined sequential order to each of the plurality of potential customers included in the database to generate a first segment of only those potential customers satisfying the first model, applying a second model included in the determined sequential order to the first segment to generate a second segment of only those potential customers satisfying the combination of the first and second models, and then applying each subsequent model included in the determined sequential order to a segment generated by the combination of each prior model to define the target group." Jackson does not describe nor teach a method as recited in Claims 24 and 25. Accordingly, Applicants further submit that dependent Claims 24 and 25 are also patentable over the cited art.

Newly added Claims 26 and 27 depend from independent Claim 11, which is believed to be in a condition for allowance. Jackson does not describe nor teach a system as recited in Claims 26 and 27. Accordingly, Applicants further submit that dependent Claims 26 and 27 are also patentable over the cited art.

In view of the foregoing amendments and remarks, all the claims now active in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited.

Respectfully Submitted,

Daniel M. Fitzgerald
Registration No. 38,880
ARMSTRONG TEASDALE LLP
One Metropolitan Square, Suite 2600
St. Louis, Missouri 63102-2740
(314) 621-5070